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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE
IN SUPPORT OF REORGANIZED
DEBTORS' THIRTIETH SECURITIES
CLAIMS OMNIBUS OBJECTION
(INSUFFICIENT SUBSTANTIVE
ALLEGATIONS AND NOTEHOLDER
SECURITIES CLAIMS)**

Date: February 27, 2024

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of Kroll
4 Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for purposes of this
5 Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible for all business
6 operations including but not limited to securities claims noticing and administration.

7 2. I am providing this Declaration in support of the *Reorganized Debtors’ Thirtieth
8 Securities Claims Omnibus Objection (Insufficient Substantive Allegations And Noteholder Securities
9 Claims)* (the “**Objection**”),¹ filed contemporaneously herewith in the chapter 11 cases (the “**Chapter 11
10 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized
11 debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable).

12 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
13 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
14 Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative fields. I
15 have personally overseen the administration of some of the most complex class action, regulatory and
16 bankruptcy administrations in the country.

17 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
18 my personal knowledge, the knowledge of other employees working under and alongside me on this
19 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various
20 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
21 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
22 Declaration on behalf of the Reorganized Debtors.

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¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the
27 Objection.
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1 **Identification of Claims Subject to the Objection**

2 5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
3 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
4 Chapter 11 Cases and identifying claims to be included in omnibus objections, including the Objection.
5 In furtherance thereof, our team has reviewed and established a database for these claims. The database
6 contains information extracted from proofs of claim and submitted by claimants via an online portal,
7 including, where such details were provided by the claimant, information regarding when such claimant
8 purports to have acquired their position(s) in the Debtors' debt and equity securities that form the basis
9 of the claim.

10 6. Based on our review, we have identified certain claims (the "Claims") derived from the
11 purchase or acquisition of specific PG&E securities – "**Utility Senior Notes**," as defined in Section
12 1.246 of the Plan – during the period from April 29, 2015 through November 15, 2018, inclusive. Each
13 Claimant held one or more Utility Senior Notes at the time of both the Petition Date and the Effective
14 Date.

15 7. The Claims are set forth on **Exhibit 1** to the Omnibus Objection, which was prepared by
16 AlixPartners, LLP, as discussed in the McWilliams Declaration filed herewith. I am familiar with the
17 contents of **Exhibit 1** and the process under which it was prepared.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

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4 Executed December 13, 2023 in New York, New York.

5 */s/ Angela Ferrante*
6 Angela Ferrante
7 Managing Director

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